

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

EARL GAVIN,)	
)	
Plaintiff,)	
)	
v.)	Case No. 7:18-cv-00523-AMQ-JDA
)	
EXPERIAN INFORMATION SOLUTIONS,)	
INC.; TRANS UNION LLC; and)	
EQUIFAX, INC.,)	
)	
Defendants.)	

MOTION IN SUPPORT OF *PRO HAC VICE* APPLICATION

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that James P. Acosta be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and
4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.
5. Certification of Consultation (Local Civil Rule 7.02).

☐ Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion: ☐ will likely oppose; ☐ does not intend to oppose
☐ Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s):



No duty of consultation is required because the opposing party is proceeding *pro se*.

Respectfully Submitted,

s/ Wilbur E. Johnson

WILBUR E. JOHNSON

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Counsel for Trans Union LLC

CERTIFICATE OF SERVICE

I hereby certify that on August 9, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following parties:

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***Counsel for Equifax, Inc. and Equifax
Information Services, LLC***

This is to certify that on August 9, 2018, a true and correct copy of the above and foregoing document has been served via First Class Mail and Electronic Mail on the following non-CM/ECF participant:

Earl Gavin
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Plaintiff *Pro Se*

s/ Wilbur E. Johnson

WILBUR E. JOHNSON